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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for EnerNOC, Inc.

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	Case No. IPC-E-15-03
APPROVAL OF NEW TARIFF SCHEDULE 82,)	
A COMMERCIAL AND INDUSTRIAL)	PETITION TO INTERVENE
DEMAND-RESPONSE PROGRAM (FLEX)	OF ENERNOC, INC.
PEAK PROGRAM))	
_____)	

ENERNOC, INC. ("EnerNOC") hereby petitions the Commission for leave to intervene in the above title proceeding pursuant to Rules 71 through 75 of the Commission's rule of Practice and Procedure, IDAPA 31.01.01.072-075. In support of this Petition, EnerNoc submits the following:

1. The name and address of EnerNOC, Inc. is:

Melanie Gillette
Director, Regulatory Affairs
EnerNOC, Inc.
115 Hazelmere Drive
Folsom, CA 95630
Telephone: (916)501-9573
Fax: (415)227-1645
mgillette@enernoc.com

2. EnerNOC's representative for the purpose of service of pleadings and other written materials is:

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3. EnerNOC is a leading developer and provider of clean and intelligent power solutions to commercial, institutional, and industrial customers, as well as electric power grid operators and utilities. EnerNOC's technology-enabled demand response and energy management solutions help optimize the balance of electric supply and demand. EnerNOC serves demand response customers throughout the Northeastern United States, as well as Arizona, Australia, California, Canada, Colorado, Florida, Idaho, New Mexico, New Zealand, Oregon, the Tennessee Valley, Texas, Utah and the United Kingdom. EnerNOC maintains 398 full time employees in its Boise, Idaho field office.

EnerNOC contracted with Idaho Power to manage the FlexPeak Management Program ("FlexPeak Program") pursuant to a February 23, 2009 Demand Response Agreement ("Agreement") (as amended pursuant to Orders 31098 and 32805), under which Idaho Power provided a voluntary demand response program for its large commercial and industrial customers. On May 9, 2013, the Commission issued Order No. 32805 implementing changes to the FlexPeak Program for the 2013 season. The Agreement expired in February 2014. This program served Idaho Power customers in both Oregon and Idaho.

4. On April 15, 2015, Idaho Power submitted Redacted Reply Comments in response to the Notice of Application and Notice of Modified procedure issued in Order No. 33242 and in response to the Comments filed on April 8, 2015 by the Commission Staff, the Industrial Customers of Idaho Power ("ICIP") and the Idaho Conservation League ("ICL"). A redacted section of Idaho Power's Redacted Reply Comments found on page 6 refers to EnerNOC's 2014 Request for Proposal and EnerNOC's management of the FlexPeak Program over the last six years.

5. EnerNOC has a direct and substantial interest in this proceeding because EnerNOC managed the FlexPeak Program for the last six years and continues to provide similar services to other customers in Idaho. As mentioned above, Idaho Power's Redacted Reply Comments contains a redacted section related to EnerNOC's 2014 Request for Proposal and EnerNOC's management of the FlexPeak Program; however, EnerNOC is unable to evaluate such information because it does not have access to the original

copy of Idaho Power's Reply Comments. Until EnerNOC is able to obtain the redacted information, it cannot identify the affect or evaluate the impact of such information. Further, the outcome of this proceeding and the continuation or modification of Idaho Power's demand response programs will have a direct affect on EnerNOC's future contracts.

6. EnerNOC intends to obtain an original copy of Idaho Power's Reply Comments and continue monitoring the proceedings as a party. EnerNOC acknowledges that Idaho Power has asked the Commission to issue an Order by May 1, 2015, and does not intend for this Petition to delay the proceeding. However, if necessary, EnerNOC will raise issues that are appropriate based upon the information it discovers in Idaho Power's Redacted Comments. Further, no other party can adequately address EnerNOC's interests in this proceeding.

WHEREFORE, EnerNOC respectfully requests that the commission grant this Petition to Intervene and authorize EnerNOC to participate in the above-entitled proceeding with the full rights of a formal party.

DATED this 24th day of April, 2015.

K&L Gates, LLP

By: 

Teresa A. Hill
Attorney for EnerNOC, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24TH DAY OF APRIL 2015, SERVED THE FOREGOING **PETITION TO INTERVENE**, IN CASE NO. IPC-E-15-03, BY EMAILING AND MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

Commission Staff

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Industrial Customers of Idaho Power

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